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12
13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**

15 MAXIMILIAN KLEIN and SARAH
16 GRABERT, individually and on behalf of all
17 others similarly situated,

18 Plaintiffs,

19 v.

20 FACEBOOK, INC., a Delaware corporation
headquartered in California,

21 Defendant.

Case no.: 5:20-cv-08570-LHK

**DECLARATION OF TINA WOLFSON IN
SUPPORT OF *SHERMAN* PLAINTIFFS'
RESPONSE TO *KLEIN* PLAINTIFFS'
MOTION FOR ADMINISTRATIVE
RELIEF TO CONSIDER WHETHER
CONSUMER CASES SHOULD BE
RELATED**

1 I, Tina Wolfson, declare:

2 1. I make this declaration upon personal knowledge and am competent to testify to
3 the facts set forth herein.

4 2. I am a partner with the law firm Ahdoot & Wolfson PC and counsel for the Plaintiffs
5 Vickie Sherman, Lezah Neville-Marrs, Katherine Loopers, and Jarred Johnson in *Sherman et*
6 *al v. Facebook, Inc.*, No. 3:20-cv-08721-JSW, filed in this District on December 9, 2020.

7 3. I submit this Declaration in support of *Sherman* Plaintiffs' response to *Klein* Plaintiffs'
8 Administrative Motion on to Relate Cases.

9 4. Affilious Inc., Jessyca Frederick, NJ Premier Inc., Timothy Mills, Mark Young, Danny
10 Collins, Joshua Jeon, 406 Property Services, Mark Berney, and MarQuisha Cork, filed the
11 case captioned *Affilious, Inc. et al. v. Facebook, Inc.*, No. 4:20-cv-09217-KAW on December
12 18, 2020. A true and correct copy of the *Affilious* complaint is attached hereto as **Exhibit 1**.

13 5. **Exhibit 1** is a true and correct comparison of the *Affilious* complaint and the
14 Amended Class Action Complaint filed in the case captioned *Reveal Chat Holdco LLC et al. v.*
15 *Facebook, Inc.*, No.5:20-cv-00363-BLF on August 7, 2020.

16 I declare under penalty of perjury under the laws of the United States that the
17 foregoing is true and correct.

18 EXECUTED this 8 January 2021.

19 /s/ Tina Wolfson.